

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

EXXON MOBIL CORPORATION,

§

§

Plaintiff,

§

§

v.

§

§

ROBERT ANDRES BONTA A.K.A.

§

ROB BONTA, IN HIS INDIVIDUAL

§

Case No. 1:25-cv-00011-MJT

CAPACITY; SIERRA CLUB, INC.;

§

SURFRIDER FOUNDATION, INC.;

§

HEAL THE BAY, INC.; BAYKEEPER,

§

INC.; AND INTERGENERATIONAL

§

ENVIRONMENT JUSTICE FUND LTD.

§

§

Defendants.

§

DECLARATION OF MARTHA KREEGER

I, Martha Kreeger, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am over the age of 18 and have personal knowledge of the facts stated in this declaration.

2. I am a resident of Fremont, California.

3. I have been a member of Sierra Club since at least 2019.

4. I was the chair of the Sierra Club, San Francisco Bay Chapter ("Sierra Club Bay Chapter") from approximately January 2024 to January 2025. My role as chair of the Sierra Club Bay Chapter was a volunteer position. I previously served in other volunteer positions at the Sierra Club Bay Chapter.

5. Typically I performed my duties as president of Sierra Club Bay Chapter from my home in Fremont, California.

6. I am not nor ever have been an employee or independent contractor of Sierra Club or any of its chapters.

7. I have never received any compensation from Sierra Club or any of its chapters.

8. On September 23, 2024, I spoke at a Burlingame, California, in-person press conference overlooking the San Francisco Bay (the "San Francisco Bay Press Conference") regarding Sierra Club's September 23, 2024 lawsuit against ExxonMobil filed in the Superior Court of California, County of San Francisco.

9. I did not invite anyone from outside the Sierra Club Bay Chapter to attend the San Francisco Bay Press Conference.

10. My statements at the San Francisco Bay Press Conference were not directed at Texas or its residents. Texas was not "the" or even "a" focal point of my statements at the San Francisco Bay Press Conference.

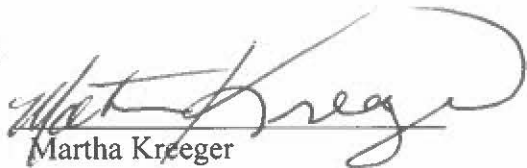
11. I did not receive a request for correction, clarification or retraction from ExxonMobil about my statements at the San Francisco Bay Press Conference.

12. I am not aware of anyone at Sierra Club receiving a request for correction, clarification or retraction from ExxonMobil about my statements at the San Francisco Bay Press Conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 24, 2025

By:


Martha Kreeger